



PARDALIS & NOHAVICKA, LLP
ATTORNEYS

July 6, 2021

VIA ELECTRONIC MAIL
info@illuminidol.com

ILLUMINIDOL LLC
1183 SOL WILSON AVE
AUSTIN, TX 78702-2413

NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)
Re: *Infringement of the “Greek Freak” Mark.*

To Whom It May Concern:

This firm represents Giannis Antetokounmpo (“Antetokounmpo”). This correspondence constitutes formal notice that we will be filing claims against your organization for trademark infringement pursuant to 15 U.S.C. § 1114(1)(a); false designation of origin and trademark dilution pursuant to 15 U.S.C. § 1125(a)(1)(A); common law claims for unjust enrichment; trademark infringement and unfair competition in violation of New York common law; and trademark dilution pursuant to 15 U.S.C. § 1125(c); and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the “Greek Freak”, is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry. He has established his professional basketball career known as “the Greek Freak”, and therefore he is identified by this nickname.

Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark “GREEK FREAK” and “GREEK FR34K” (application approved by the USPTO) both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely candles and other related items bearing Antetokounmpo’s mark through Instagram (<https://instagram.com>), Illuminidol (<https://illuminidol.com>) and potentially through other outlets. See **Exhibit A**. As a result, we wish

to bring to your attention that your actions constitute infringement and a violation of Antetokounmpo's Right of Publicity. Moreover, this unauthorized and unlawful use of our client's mark can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREEK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights to the above trademarks from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates the "GREEK FREAK" and other similar variations, as well as of the profits derived from the use of "GREEK FREAK" mark received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's trademarks and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusing similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

Additionally, you are required to preserve documents and information relating to the dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this litigation hold has been updated, modified, or released. Failure to preserve documents and information relating to the dispute may expose you to sanctions and/or legal liability.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.

EXHIBIT A

3:22 ↗



Shop



...



illuminidolcandles



Giannis Antetokounmpo

\$15

[View on Website](#)

Details



More from this shop

[See All](#)



ORDERS TO CHARITIES

SHOP • CUSTOM WHOLESALE



ABOUT POLICIES NEWS CONTACT

ENTER YOUR EMAIL FOR \$1 OFF YOUR ORDER!



FILTER BY:

GIANNIS ANTETOKOUNMPO

\$15.00

1

Add to cart

Saint Giannis Antetokounmpo featured on Illuminidol's Texas-made 8" celebrity prayer candle. The most divine way to bless any Greek Freak disciple!

- Texas Made
- 8" in height
- Unscented
- Ships anywhere in the US via Priority Mail
- International Shipping? Please contact info@illuminidol.com
- Custom and Wholesale options available





August 31, 2020

VIA REGULAR MAIL & EMAIL

stacey.infanti@gmail.com
ohsokerazy03@earthlink.net
stacey@theglenrussellteam.com

Joe Infant d/b/a InfantiCustoms
1523 Cloverhill Rd;
Pottstown, PA 19464-1750

NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity.*

Ms. Infant:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for infringement pursuant to 15 U.S.C. § 1114(1)(a); false designation of origin and dilution pursuant to 15 U.S.C. § 1125(a)(1)(A); common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the "Greek Freak", is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry. He has established his professional basketball career known as "the Greek Freak", and therefore he is identified by this nickname.

Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark "GREEK FREAK" and "GREEK FR34K" (application approved by the USPTO) both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely wall prints bearing Antetokounmpo's trademarks, through Etsy (<https://www.etsy.com/>) website and potentially through other outlets. *See Exhibit A.* As a result, we wish to bring to your attention that your actions constitute violation of our client's right of publicity. Moreover, this unauthorized and unlawful use of our client's marks can result in a likelihood of significant consumer confusion as to the source and affiliation of the products, and dilution of the value of our client's trademarks. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights to the above trademarks from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates the "GREEK FREAK" and other similar variations, as well as of the profits derived from the use of "GREEK FREAK" mark received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's trademarks and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.

EXHIBIT A

etsy.com/listing/811766127/giannis-antetokounmpo-print?ga_search_query=giannis&ref=shop_items_search_1&crt=1

Clio Gmail Google Keep Clio eCourts NYS Division of Cor... Pacer Login New York City Civil... New York City Civil...

Etsy giannis

Everyday Finds Jewelry & Accessories Clothing & Shoes Home & Living Wedding & Party Toys & Entertainment Art & Collectibles Craft Supplies Gifts

Back to search results

Giannis Antetokounmpo Print

\$40.00+ Low in stock

Material: Select a material

Dimensions: Select dimensions

Add to cart

Don't miss out. There's only 5 available and 3 other people have this in their cart right now.

Handmade

Description: Premium Photo Paper OR Premium Canvas

GIANNIS ANTETOKOUNMPO - CANVAS PRINT - PREMIUM POSTER PRINT

High-quality prints, which make for the perfect gift for any fan, home, man cave, bedroom, or sports bar / pub decor.

Learn more about this item

7 shop reviews ★★★★★

Alex Rodriguez May 27, 2020

★★★★★

Nice piece took 2 weeks to get here.

Be here to search

8/27/2020 3:18 PM



PARDALIS & NOHAVICKA, LLP
ATTORNEYS

June 10, 2021

VIA ELECTRONIC MAIL

dragzer223@yahoo.com
rjperkins93@gmail.com
dragzer221@yahoo.com
dragzer221@gmail.com

Roney D Perkins d/b/a THEEBESTESSENTIALS
4540 N El Dorado St, APT 207
Stockton, CA 95207-7201

NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity*

Mr. Perkins:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the "Greek Freak", is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry. Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely stickers, and other related products bearing Antetokounmpo's name, through Etsy (<https://etsy.com>) website and potentially through other outlets. See **Exhibit A**. As a result, we wish to bring to your attention that your actions constitute a violation of Antetokounmpo's Right of Publicity. Moreover, this unauthorized and unlawful use of our client's likeness and name can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE

and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREEK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates Antetokounmpo's likeness and name, as well as the profits derived from the use of Antetokounmpo's name and likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's name and likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies. We reserve all rights and remedies under all applicable Federal and State laws.

Additionally, you are required to preserve documents and information relating to the dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this litigation hold has been updated, modified, or released. Failure to preserve documents and information relating to the dispute may expose you to sanctions and/or legal liability.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.

EXHIBIT A

etsy.com/listing/980735694/giannis-antetokounmpo-nba-jersey-vinyl?ga_order=most_relevant&ga_search_type=all&ga_view_type=gallery&ga_search_query=greek+freak&ref=sr_gallery-2-29&ori...

New York State Unif...

Etsy greek freak

Mother's Day Jewelry & Accessories Clothing & Shoes Home & Living Wedding & Party Toys & Entertainment Art & Collectibles Craft Supplies Gifts & Gift Cards

Back to search results



THEEBESTESSENTIALS
1,089 sales ★★★★
Giannis Antetokounmpo NBA Jersey Vinyl Sticker
\$3.00+ ✓ In stock
pick Select an option
Quantity 1
Buy it now Add to cart
Arrives by Apr 28-May 4 if you order today.
Hooray! This item ships free to the US.

Highlights

11:43 AM 4/28/2021



PARDALIS & NOHAVICKA, LLP
ATTORNEYS

May 28, 2021

VIA ELECTRONIC MAIL

n_ashby4@yahoo.com

Nathan Ashby d/b/a Nate-Ash
920 Loma Avenue #3
Long Beach California, 90804

NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity*

Mr. Ashby:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the "Greek Freak", is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry. Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely apparel, stickers, and other related products bearing Antetokounmpo's likeness, through Redbubble (<https://redbubble.com>) website and potentially through other outlets. See **Exhibit A**. As a result, we wish to bring to your attention that your actions constitute a violation of Antetokounmpo's Right of Publicity. Moreover, this unauthorized and unlawful use of our client's likeness can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from

initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREEK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates Antetokounmpo's likeness and name, as well as the profits derived from the use of Antetokounmpo's name and likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies. We reserve all rights and remedies under all applicable Federal and State laws.

Additionally, you are required to preserve documents and information relating to the dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this litigation hold has been updated, modified, or released. Failure to preserve documents and information relating to the dispute may expose you to sanctions and/or legal liability.

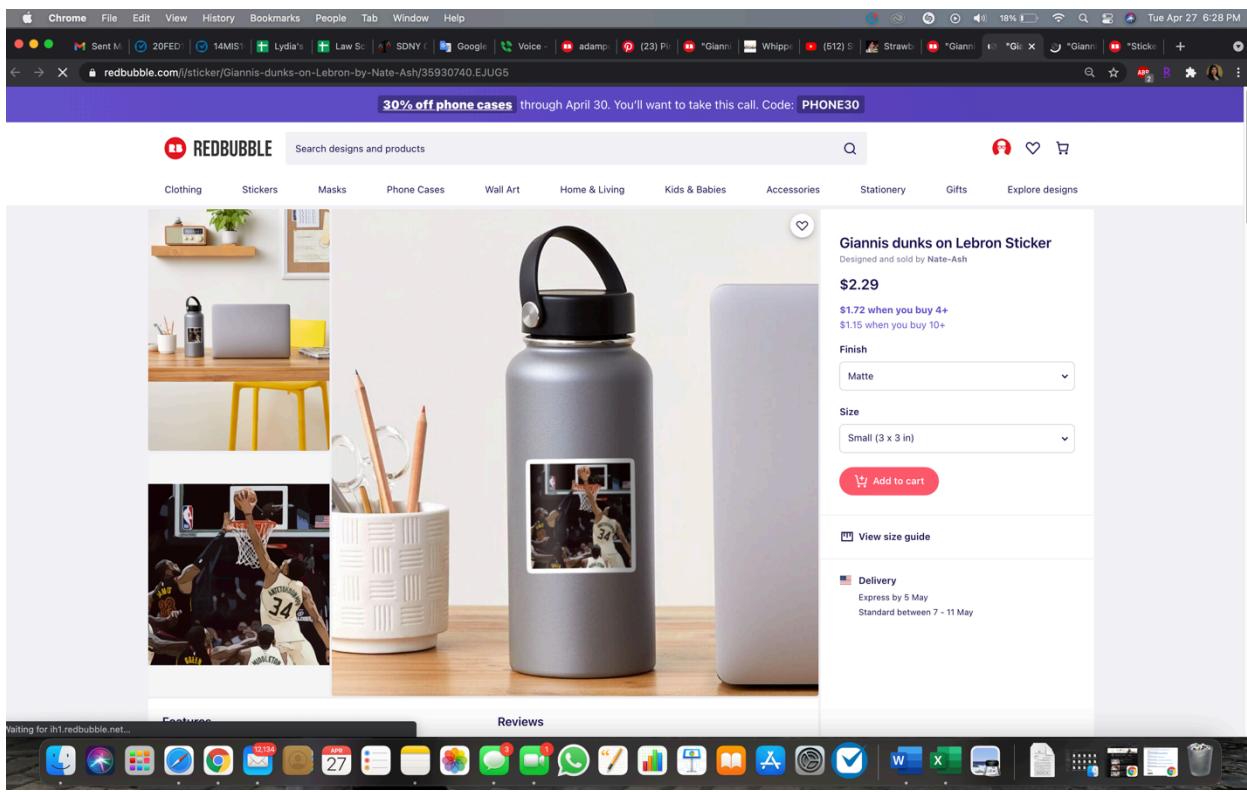
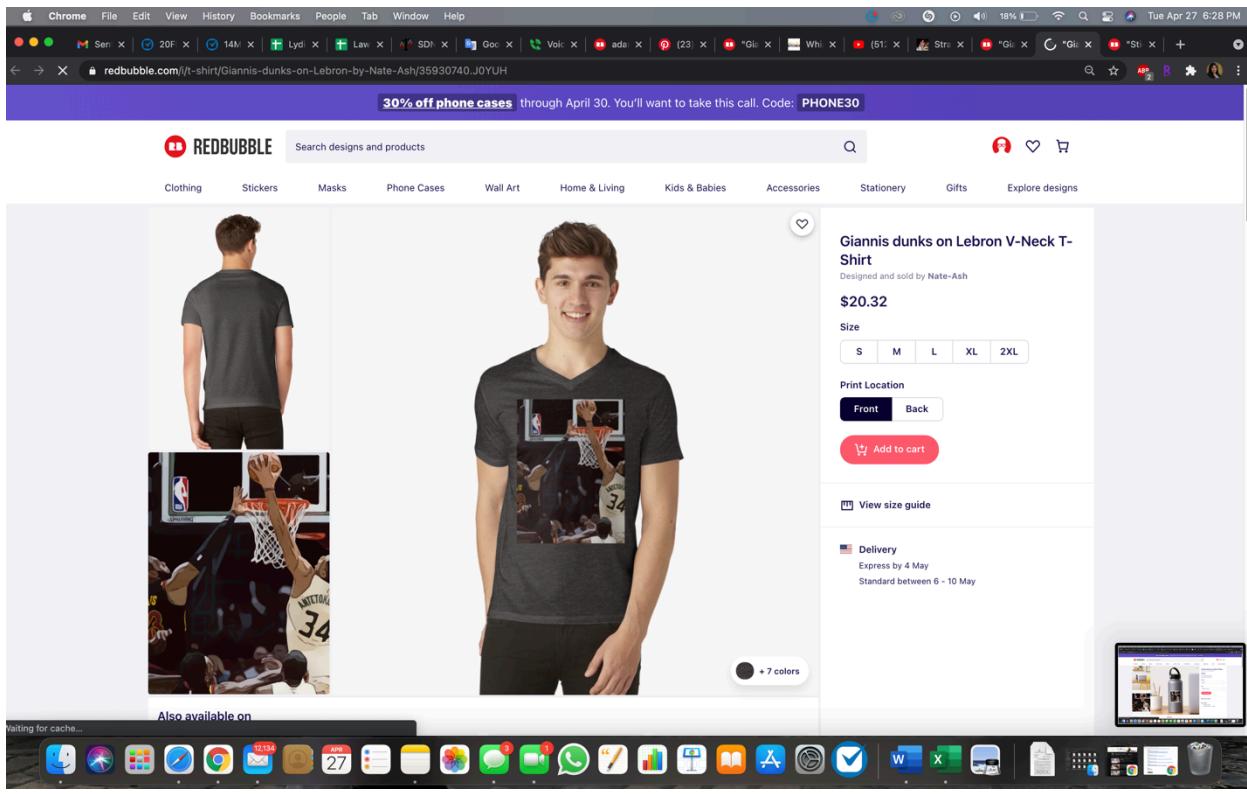
If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.

EXHIBIT A





PARDALIS & NOHAVICKA, LLP
ATTORNEYS

July 13, 2021

VIA ELECTRONIC MAIL
mekhailcobb02@gmail.com

Me'Khail Cobb
3941 Teddington Way,
Indianapolis, IN, 46228, USA

NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity.*

To Whom It May Concern:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

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It recently came to our attention that you sell products, namely apparel, and other related products bearing Antetokounmpo's name and likeness, through Instagram (<https://instagram.com>), Global Collectives (<https://globalcollectives.com>) website and potentially through other outlets. *See Exhibit A.* As a result, we wish to bring to your attention that your actions constitute a violation of Antetokounmpo's Right of Publicity. Moreover, this unauthorized and unlawful use of our client's likeness and name can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK

FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates Antetokounmpo's likeness and name, as well as the profits derived from the use of Antetokounmpo's name and likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies. We reserve all rights and remedies under all applicable Federal and State laws.

Additionally, you are required to preserve documents and information relating to the dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this litigation hold has been updated, modified, or released. Failure to preserve documents and information relating to the dispute may expose you to sanctions and/or legal liability.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.

EXHIBIT A

1:10

Shop

Cart

...



king_khai00

“Giannis Antetokounmpo” The Playoffs Edition

\$34.99

[View on Website](#)

Description

“Giannis Antetokounmpo” The Playoffs Edition From Global Collectives

This Heavyweight Tee gives a rich and structured look to the classic t-shirt and works great for layered streetwear outfits. Thanks to its durable fabric, it maintains sharp lines along the edges and lasts a long time.

100% cotton

Sport Grey is 90% cotton, 10% polyester

Fabric weight: 5.0–5.3 oz/yd² (170–180 g/m²)

Open-end yarn



PARDALIS & NOHAVICKA, LLP
ATTORNEYS

February 22, 2021

VIA ELECTRONIC MAIL

bcduckie2@yahoo.com

bcduckie@aol.com

djhaghdf@aol.com

Bailey W Carlin d/b/a BWC Design aka
BaileyCarlinMerch1
336 Palmetto Street
Brooklyn, NY 11237-5902

NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)
Re: *Infringement of the “Greek Freak” Mark*

Dear Mr. Carlin:

This firm represents Giannis Antetokounmpo (“Antetokounmpo”). This correspondence constitutes formal notice that we will be filing claims against your organization for trademark infringement pursuant to 15 U.S.C. § 1114(1)(a); false designation of origin and trademark dilution pursuant to 15 U.S.C. § 1125(a)(1)(A); common law claims for unjust enrichment; trademark infringement and unfair competition in violation of New York common law; and trademark dilution pursuant to 15 U.S.C. § 1125(c); and deceptive acts and practices pursuant to New York General Law Section 349.

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Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. He has therefore registered the mark “GREEK FREAK” and “GREEK FR34K” (application approved by the USPTO) both in Europe and the United States. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products, namely t-shirts, bearing Antetokounmpo's trademarks, through online marketplaces such as <https://teepublic.com>. See **Exhibit A**. As a result, we wish to bring to your attention that your actions constitute infringement of our client's trademarks. Moreover, this unauthorized and unlawful use of our client's marks can result in a likelihood of significant consumer confusion as to the source and affiliation of the products, and dilution of the value of our client's trademarks. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights to the above trademarks from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates the "GREEK FREAK" and other similar variations, as well as of the profits derived from the use of "GREEK FREAK" mark received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's trademarks and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: _____ /s/Taso Pardalis/
Taso Pardalis, Esq.

EXHIBIT A

teepublic.com/t-shirts?query=giannis

New York State Unif...

HEAVYWEIGHT T-SHIRTS

- Ringer T-Shirt
- Curvy V-Neck
- Tank Tops
- Hoodies
- Crewneck Sweatshirts
- Long Sleeve T-Shirts
- Baseball T-Shirts
- Kids Apparel
- Kids T-Shirts
- Kids Hoodie
- Kids Long Sleeve T-Shirt
- Onesies
- Masks
- Masks
- Home Goods
- Wall Art
- Notebooks
- Mugs
- Pillows
- Totes
- Tapestries
- Pins

The screenshot shows a grid of t-shirt designs. From top-left to bottom-right, the designs are:

- "Giannis Greek Freak Antetokoun..." by sandiesays (\$20)
- "the greek freak T-Shirt" by sandiesays (\$20)
- "Giannis Antetokounmpo MVP T-..." by sandiesays (\$20)
- "Milwaukee Bucks Giannis Antetokoun..." by Tee'd Up (\$20)
- "All Hail The Greek Freak T-Shirt" by Tee'd Up (\$20)
- "The Goat may be a Buck T-Shirt" by BaileyCarlInMerch1 (\$20)
- "GREEK FREAK" (Home Goods)
- "Giannis" (Home Goods)
- "The Goat may be a Buck T-Shirt" (Home Goods)

4.4 ★★★★☆ Google Customer Reviews

1:21 PM 2/19/2021

teepublic.com/t-shirt/1987459-the-goat-may-be-a-buck

New York State Unif...

TEEPUBLIC Search all designs Sign Up Log In Cart

BROWSE ADULT APPAREL KIDS APPAREL MASKS HOME GOODS CASES & STICKERS English (US) - \$ USD

The Goat may be a Buck T-Shirt

Giannis Antetokounmpo T-Shirt
Designed and Sold by [BWC Design](#)
Will Giannis be the GOAT?

Color: Heather

Gender: Male Female

Style:

Size:

[View Size Chart](#)

\$20

ADD TO CART

4.4 ★★★★☆ Google Customer Reviews

1:21 PM 2/19/2021



PARDALIS & NOHAVICKA, LLP
ATTORNEYS

June 30, 2021

VIA ELECTRONIC MAIL

nmregini@gmail.com

Nick Regini d/b/a NRSportsDesign
6 McCann Drive
Lagrangeville, New York 12540

NOTICE OF INFRINGEMENT AND
NOTICE TO CEASE AND DESIST

DEMAND TO CEASE AND DESIST

(This document should be presented to your legal representative upon receipt)

Re: *Violation of Giannis Antetokounmpo's Right of Publicity.*

To Nick Regini:

This firm represents Giannis Antetokounmpo ("Antetokounmpo"). This correspondence constitutes formal notice that we will be filing claims against your organization for false designation of origin; common law claims for unjust enrichment; unfair competition in violation of New York common law; and deceptive acts and practices pursuant to New York General Law Section 349.

Antetokounmpo, a/k/a the "Greek Freak", is a professional basketball player for the Milwaukee Bucks of the National Basketball Association (NBA). Antetokounmpo is one of the most renowned and globally-recognizable athletes in the sport industry. Antetokounmpo is committed to protecting and defending his brand name against any unauthorized use and exploitation. Only third parties authorized by our client have the right to use his image, likeness, name and/or nickname, under conditions mutually agreed.

It recently came to our attention that you sell products bearing my client's name and likeness on items, namely phone cases, apparel, and other related products through your website, Redbubble (<https://www.redbubble.com/>) and potentially through other outlets. See **Exhibit A** for screenshots showing the infringing items.

As a result, we wish to bring to your attention that your actions constitute a violation of Antetokounmpo's Right of Publicity. Moreover, this unauthorized and unlawful use of our client's likeness and name can result in a likelihood of significant consumer confusion as to the source and affiliation of the products. Your attempt to gain significant pecuniary advantage by exploiting the intellectual property rights of a famous personality without permission is also an unlawful commercial practice at the expense of Mr. Antetokounmpo and authorized sellers of products under his brand.

This correspondence shall constitute the formal demand that you immediately CEASE

and DESIST, whether it is you or by third parties who do business with you or act on your behalf, from initiating, engaging or continuing any use of our client's likeness, name and trademarks "GREEK FREAK" and "GREAK FR34K" and other relevant variations of these marks, and that you promptly remove all the products and merchandise which infringe upon our client's exclusive rights from your inventory, website and social media pages.

We prefer to resolve this matter without taking any legal action, however, our client will undertake all appropriate steps to protect his intellectual property rights and the associated goodwill which is related to his nickname. You may avoid a lawsuit by having your authorized representative or an attorney respond to our office no later than five (5) days from the date of this letter, together with a full accounting of every merchandise sold by you that utilizes or incorporates Antetokounmpo's likeness and name, as well as the profits derived from the use of Antetokounmpo's name and likeness received to date which rightfully belong to our client.

We, also, request a written agreement that you will immediately cease and desist all use of our client's likeness and a written agreement that you will not use without written authorization any mark belonging to Mr. Antetokounmpo, or anything confusingly similar thereto. You will have to surrender all infringing items in your possession, namely the items associated with Antetokounmpo and copies of your records which include the names of all parties which manufacture, import, export, distribute and purchase the infringing products.

Kindly note that nothing in this letter should be construed as a waiver, relinquishment or election of rights or remedies by the rightful owner of the marks. We reserve all rights and remedies under all applicable Federal and State laws.

Additionally, you are required to preserve documents and information relating to the dispute mentioned in this notice. All individuals in possession of potentially relevant information are under legal obligation to immediately preserve the documents wherever located and in whatever form including both hard copy and in electronic form. You are to immediately suspend the deletion, overriding or any other destruction of electronic information and communications relevant to the lawsuit. Any new electronic information that is generated after this date must also be preserved. These obligations will remain in effect until you receive a subsequent written notice that this litigation hold has been updated, modified, or released. Failure to preserve documents and information relating to the dispute may expose you to sanctions and/or legal liability.

If you or your attorney have any questions, please feel free to contact our office.

Very truly yours,

PARDALIS & NOHAVICKA, LLP

By: /s/Taso Pardalis/
Taso Pardalis, Esq.

EXHIBIT A

New season. Fan art merch. It's a good time to be a [Rick and Morty fan](#).

MILWAUKEE Bucks Giannis, Khris, Jrue Essential T-Shirt
Designed and sold by [NRSportsDesign](#)

\$19.90

[PayPal](#) Pay in 4 interest-free payments on qualifying purchases. [Learn more](#)

Size
S M L XL 2XL 3XL

Print Location
 Front Back

Add to cart

[View size guide](#)

Delivery
Express by 24 June
Standard between 28 - 30 June

Also available on

New season. Fan art merch. It's a good time to be a [Rick and Morty fan](#).

Milwaukee Bucks Giannis, Khris, Jrue Laptop Skin
Designed and sold by [NRSportsDesign](#)

\$25.25

Type
 Macbook Air 13" (2015)

Add to cart

Features